

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

ROBERT L. McCRAY (AIS #167644),

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Plaintiff,

*

V.

2:05-CV-887-F

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PRISON HEALTH SERVICES, INC. et al.,

*

Defendant.

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DEFENDANTS' MOTION TO EXTEND TIME TO FILE
SPECIAL REPORT AND ANSWER

COME NOW Defendants, Prison Health Services, Inc., Michael Robbins, M.D., Winfred Williams, M.D., John Peasant, M.D., Donald McArthur, PA-C, Aaron Bee, R.N., H.S.A., Lisa Lassiter, C.R.N.P and Debra Austin, L.P.N. and respectfully request that this Honorable Court extend the time period which these Defendants have to file their Answer and Special Report in this action by fourteen days (14) up to and including April 13, 2006. As grounds for this Motion, Defendants show to the Court as follows:

1. The Plaintiff has made complex allegations in his Complaint against multiple correctional health care providers including the company that contracts with the Alabama Department of Corrections to provide care to inmates, three Physicians, a Nurse Practitioner, a Licensed, Practical Nurse, a Physicians Assistant and a former Health Services Administrator.
2. Due to unavoidable scheduling conflicts, counsel for the Defendants has been unable to meet with all of the Defendants to discuss their defense in this matter.

3. Moreover, the Defendants have not yet received responses to subpoenas for medical records outstanding from this inmate's "free world" care providers.
4. Due to the number of Defendants named, the complex nature of the Plaintiff's Complaint and the need to receive information from this inmate's "free world" treating physicians, these Defendants are in need of additional time to provide the Court with a Special Report and Answer pursuant to its pending Order.

WHEREFORE, these Defendants request that this Honorable Court extend the time in which they have to respond to this Court's pending Order by fourteen (14) days up to and including April 13, 2006.

Respectfully submitted,

s/L. Peyton Chapman, III
Alabama State Bar Number CHA060
s/R. Brett Garrett GAR085
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served by U.S.
Mail

this the 30th day of March, 2006, to:

Robert L. McCray AIS #167644
Staton Correctional Facility
P.O. Box 56
Elmore, Alabama 36025

s/R. Brett Garrett GAR085
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